

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

AT&T INC., AT&T SERVICES, INC.,
AT&T MOBILITY, LLC AND AT&T
CORP.,

Defendants.

Case No. 2:23-cv-00397-JRG-RSP

LEAD CASE

JURY TRIAL

HEADWATER RESEARCH LLC,

Plaintiff,

v.

AT&T INC., AT&T SERVICES, INC.,
AT&T MOBILITY, LLC AND AT&T
CORP.,

Defendants.

Case No. 2:23-cv-00398-JRG-RSP

LEAD CASE

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DECLARATION OF PAUL A. KROEGER IN SUPPORT OF
PLAINTIFF HEADWATER RESEARCH LLC'S
MOTION FOR SUMMARY JUDGEMENT OF AT&T DEFENDANTS' FIRST, FIFTH,
SEVENTH AND ELEVENTH AFFIRMATIVE DEFENSES

I, Paul A. Kroeger, declare and state as follows:

1. I am a member of the State Bar of California, an attorney at the firm of Russ August & Kabat, and counsel of record for Plaintiff Headwater Research LLC in the above-captioned action. I submit this declaration in support of Plaintiff's Motion for Summary Judgement of AT&T Defendants' First, Fifth, Seventh and Eleventh Affirmative Defenses. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. Attached as Exhibit 1 is a true and correct copy of Defendants' Fourth Supplemental Objections and Responses to Plaintiff's First Set of Interrogatories (Nos. 1-17), served on February 26, 2025.

3. Attached as Exhibit 2 is a true and correct copy of an excerpt from Jason Sikes' January 8, 2025, Deposition Transcript.

4. Attached as Exhibit 3 is a true and correct copy of the assignment for U.S. Patent No. 8,589,541, beginning at bates-stamp HW397-00051452.

5. Attached as Exhibit 4 is a true and correct copy of the assignment for U.S. Patent No. 9,215,613, beginning at bates-stamp HW397-00051482.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 2, 2025, at Los Angeles, California.

/s/ Paul A. Kroeger
Paul A. Kroeger

CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2025, I electronically filed and served the foregoing document with the Clerk of the Court for the Eastern District of Texas using the ECF System.

/s/ Paul A. Kroeger

Paul A. Kroeger